

BLANK ROME LLP
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
(212) 885-5000
Attorneys for Defendant Harry Winston, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----		X
COREY REED,		: Case No. 18-cv-1378 (AJN)
		:
	Plaintiff,	:
		:
-against-		: NOTICE OF MOTION
		: TO DISMISS THE COMPLAINT
		:
HARRY WINSTON, INC.,		:
		:
	Defendant.	:
		:
-----		X

PLEASE TAKE NOTICE that, upon the June 21, 2018 Declaration of Robert Scott, the June 21, 2018 Declaration of Andreas Uebelbacher, and the exhibits annexed thereto, the accompanying memorandum of law, and all other pleadings and proceedings in this case, Defendant Harry Winston, Inc. ("Defendant"), by and through its counsel, Blank Rome LLP, will move this Court before the Honorable Alison J. Nathan, United States District Judge, at the United States Courthouse located at 40 Foley Square, New York, NY 10007, Courtroom 906, on a date and time designated by the Court, for an Order pursuant to Fed. R. Civ. P. 12(b)(1) and (6) dismissing the Complaint of Plaintiff Corey Reed in its entirety, and granting Defendant such other and further relief as the Court deems just and proper.

Dated: New York, New York
June 21, 2018

BLANK ROME LLP

By: /s/ Samuel D. Levy

Samuel D Levy
Craig M. Flanders
Martin S. Krezalek

The Chrysler Building
405 Lexington Avenue
New York, New York 10174
(212) 885-5000
Attorneys for Defendant Harry Winston, Inc.